

### REMARKS

In response to the Examiner's Action mailed on November 15, 2006, claims 1 to 21 are amended and the Applicant would like to respectfully requests that the patent application be reconsidered and allowed.

An item-by-item response to Examiner's objections or rejections is provided in the followings:

**1. *Rejection of Claims Under 35 USC 103:***

The Examiner rejects claims 1-21 under 35 U.S.C. 103(a) as being unpatentable over Rivette et al., US 5,991,780 A priority filed 11/19/1993 in view of Krause et al., US 5,625,827 filed 12/23/1994.

According to the Examiner, the Krause teaches a textual description of a graphic element, such as a section of a drawing, as shown in Krause, figure 5 which includes textual descriptions of graphic elements, such as "Building Paper", "Fixed Base Clip", etc. The Examiner further noted that the textual descriptions may refer to a file OR a note, and are representative of the graphic elements in the drawings, as taught in Krause, column 9, lines 37-39 which states that "The "A" hotspot will call up a textual description which is in a note of text file named A in memory 30 as illustrated in Fig. 5". The Examiner further noted that even if the textual description as taught by Krause is contained with a file rather than a note, it is still representative of a description of the graphic element to which it is associated and therefore meets the limitation of a textual description designating a naming term.

The Examiner further noted that it is well known in the art at the time of the invention that various data may be combined into a single processor-recognizable file. At the time of the invention it would have been obvious to one of ordinary skill in the art to include the textual descriptions and processor-recognizable elements of Rivette and Krause in a single file without changing the respective function of the references and yielding the predictable result of storing both the textual descriptions and the processor-recognizable elements. Furthermore, it would have been obvious to do so, providing the benefit of

allowing the textual descriptions to be stored with the processor-recognizable elements thus making further updates more easily manageable by allowing the developer to access only a single file requiring the updates rather than multiple files.

The Applicant would like to respectfully submit that the disclosures made by Kraus actually and practically teach away from combining the multiple files into a single file as suggested by the Examiner. Krause teaches a system to store the construction drawings or blueprints in a plurality of computer files. Krause's inventions includes a method for manipulating a plurality of document files including construction building drawings in a computer memory to select "at least two measuring points in the drawing; and automatically determining a measured quantity represented by the measuring points scaled to the full scale dimension (**Krause column 2, lines 16-19**). For a system to store and manipulate construction drawings and blueprints, it would not be desirable or practical to combine these multiple files into a single file. Different subcontractors may handle different parts of the construction project. Each subcontractor would prefer to access a separate file without the requirement to invoke a single huge file that contains large amount of drawings and descriptions not necessarily related to the part managed and handled by different subcontractors. It is further undesirable to allow different subcontractor teams to access the design and detail blueprints unrelated to the construction jobs by combining the plurality of files into a single file.

For these reasons, the Applicant would like to respectfully disagree with the Examiner's application of Kraus in view of Rivette as a basis for obviousness for combining multiple blueprints and construction drawings into a single file. The disclosures as made by Krause when combined with Rivette actually teach away from this invention in processing a single file or a single document as already amended.

However, in order to respond to the Examiner's "Response to Arguments", and to further distinguish this invention from Rivette and Krause, the claims are further amended. The amended claim 1 is directed to a naming-term based and graphically aided document management and review system comprising:

- 1) a document reading means for reading a single document having textual descriptions and at least a drawing having at least a graphic element assigned and illustrated with an alpha-numeral designation and described with said alpha-numeral designation designating a naming term in said textual descriptions, wherein said document reading means is further provided for converting said graphic element assigned with said alphanumerical designation and said textual descriptions to a plurality of processor-recognized elements and incorporating said textual descriptions and said plurality of processor-recognized elements in a single processor-recognizable file;
- 2) a search and link means for searching within said single-processor recognizable file for linking said processor-recognized elements with said alpha-numeral designation with at least one associated **segment of said textual descriptions including and describing said naming term designated by said alpha-numeral designation** illustrated by said graphic element; and
- 3) a display means for displaying said drawing with said naming-term displayed immediately **and directly** next to said graphic element illustrated with said alpha-numeral designation assigned to said graphic element whereby a document reviewer can directly and graphically view and associate said graphic element together with said naming term.

Specifically, claim 19 is amended to direct to a method for reading and managing a single document having textual descriptions and at least a drawing consisted of graphic elements designated with an graphic element designation associated with a naming term in one of said textual descriptions of said single document incorporated in a single processor-recognizable file, comprising:

employing a display means for displaying said drawing **with said naming term included and described in said textual description** for displaying **immediately and directly** next to said **graphic element** whereby a document reviewer can directly and simultaneously view and associate said naming term to said graphic element without requiring a processor to process multiple files.

With the added elements, the amended claims have more limited scopes and further distinguish from Revette and Krause with distinguishing advantages of easier to review/process with simplified processes incorporated in a software system that neither Revette or Krause has ever suggested or motivated. Specifically, the amended claims are further differentiated from Krause:

- 1) The "naming term" in Krause, i.e., the "hot spots A, B, C", are used by Krause only to link to different files or "note", but these "naming terms" have never been described in the textual descriptions. The claims as now amended for this invention further specifically limited to the naming terms that are described in the textual descriptions.
- 2) The display of Krause of these hot spots A, B, C are shown in a different "Windows " and not "immediately and directly next to the graphic element. The display shown in Fig. 5 with different display "windows" are actually away and NOT directly related to the graphic elements but a different level of the "hot spots". The claims as now amended are different, not obvious when compared with the display shown in Fig. 5 of Kraus that actually teaches away from the invention as now amended with more specific, limited and narrower scopes.

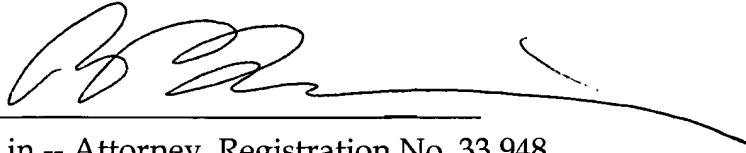
For these reasons, the Applicant respectfully request that the Examiner's rejection be withdrawn for the amended claims.

For the above reasons, the claims 1-21 would be non-obvious in view of the cited prior art references.

With the claims as now presented and the reasons provided above, the applicant hereby respectfully requests that Examiner's rejections under 35 USC § 103 be withdrawn and the present application be allowed.

Respectfully submitted,  
Bo-In Lin.

By

A handwritten signature in black ink, appearing to be 'Bo-In Lin', written over a horizontal line.

Bo-In Lin -- Attorney, Registration No. 33,948  
13445 Mandoli Drive, Los Altos Hills, CA 94022  
(650) 949-0418 (Tel), (650) 949-4118 (Fax)